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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA

v.

SHAUN W. BRIDGES  
(A/K/A "NUMBER 13"),

Defendant.

NO. CR 15-CR 319-001 RS

# UNITED STATES' MOTION TO UNSEAL RENEWED EMERGENCY MOTION FOR DEFENDANT'S IMMEDIATE REMAND AND ARREST AND PROPOSED ORDER

1 On January 27, 2016, the government filed under seal and ex parte a Renewed Emergency  
2 Motion for the Defendant's Immediate Remand ("Emergency Motion" attached as Exhibit A hereto) and  
3 an accompanying arrest warrant. In support of its Emergency Motion, the government attached as an  
4 Exhibit a federal search warrant dated January 27, 2016 ("search warrant" attached as Exhibit B hereto)  
5 authorizing the search and seizure of evidence from the defendant's residence. The affidavit in support  
6 of that search warrant detailed an ongoing investigation into a new series of bitcoin thefts -- and  
7 laundering of proceeds -- that the government is investigating. At the time the government filed its  
8 Emergency Motion, the government requested the sealing of that Motion and accompanying documents  
9 because (1) defendant Bridges was still at liberty on release conditions set by the Court; and (2) the  
10 underlying search warrant was under seal for the reasons that it discussed an ongoing investigation and  
11 premature disclosure could jeopardize that investigation. As set forth below, the government hereby  
12 notifies the Court that the reasons supporting the need for sealing these documents has lessened.

13 First, since the time the Emergency Motion was filed, the search warrant has been executed at  
14 the defendant's residence and he is thus well-aware that the government is investigating him and his co-  
15 conspirator(s) for a host of new criminal conduct that the government submits is potentially more  
16 serious than the prior crimes to which he pleaded guilty before this Court. Second, the defendant is, at  
17 this point, now aware of what items were seized by the government pursuant to the warrant. In addition,  
18 the federal judge in Maryland who authorized the search warrant recently ordered the government to  
19 provide defendant Bridges with a copy of the search warrant.<sup>1</sup>

20 Moreover, in the intervening five months since the search warrant and Emergency Motion were  
21 filed, the government's investigation has progressed significantly: the warrant and Motion only reflected  
22 the information the government had at that time; those documents do not reflect all of the information  
23 the government has since developed in the investigation, including but not limited to, blockchain and  
24

25  
26 <sup>1</sup> The magistrate judge in Maryland ordered that the government could provide the search  
27 warrant to BRIDGES in redacted fashion. However, upon reflection, there is no meaningful way in  
28 which to redact the relevant warrant and therefore the government -- in order to comply with that Court's  
order and for the foregoing reasons -- yesterday filed a Motion to Unseal the entire search warrant which  
Magistrate Judge Timothy Sullivan granted this morning. That search warrant has thus now been  
unsealed by that Court and is attached as Exhibit B hereto.

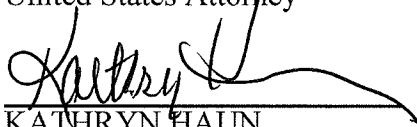
1 forensic analysis as well as additional sources of evidence. More criminal charges are anticipated in a  
2 separate case.

3 For the foregoing reasons, the government requests the Court unseal the previously-sealed  
4 documents, i.e. the Renewed Emergency Motion for Defendant's Immediate Remand and Arrest,  
5 Exhibits in support thereof, and Order Sealing the Same. A Proposed Order is attached.

6  
7 DATED: June 30, 2016

Respectfully submitted,

8  
9 BRIAN J. STRETCH  
United States Attorney

10   
11 KATHRYN HAUN  
12 WILLIAM FRENTZEN  
13 STEPHANIE HINDS  
Assistant United States Attorneys

14 RICHARD B. EVANS  
Public Integrity Section

**PROPOSED ORDER**

For the reasons set forth above, the government's unsealing motion is GRANTED;

The following documents are hereby ORDERED unsealed:

UNITED STATES' RENEWED EMERGENCY MOTION FOR DEFENDANT'S IMMEDIATE REMAND AND ARREST AND PROPOSED ORDER; EXHIBITS THERETO; AND ORDER SEALING THE SAME, all previously filed under seal and ex parte

UNITED STATES' MOTION TO UNSEAL RENEWED EMERGENCY MOTION FOR DEFENDANT'S IMMEDIATE REMAND AND ARREST AND PROPOSED ORDER EXHIBITS THERETO; AND [ORDER UNSEALING THE SAME]

The Clerk's Office is directed to file the foregoing documents electronically forthwith.

6/30/16

  
HON. RICHARD SEEBORG  
U.S. District Court